

1
2 Kyle R. Knapp, SBN 166597
3 Attorney at Law
4 916 2nd Street
5 2nd Floor
6 Sacramento, CA 916814
7 916-441-4717
8 Fax: 916-441-4299
9 kyleknapp@sbcglobal.net

10 Attorney for Defendant
11 Cody. Cramer

12
13
14 IN THE UNITED STATES DISTRICT COURT
15 FOR THE EASTERN DISTRICT OF CALIFORNIA

16 UNITED STATES OF AMERICA,) Case No. 2:21-cr-00155-JAM
17 Plaintiff,)
18 vs.) **STIPULATION AND ORDER TO CONTINUE**
19 JOSHUA WILSON and) **STATUS CONFERENCE AND EXCLUDE TIME**
20 CODY CRAMER,)
21 Defendants.)
22 _____)
23 Date: August 20, 2024
24 Time: 9:00 a.m.
25 Judge: Hon. John A. Mendez

26 IT IS HEREBY STIPULATED and agreed by and between United States Attorney
27 Phillip A. Talbert, through Assistant United States Attorney James R. Conolly, counsel for
28 Plaintiff; Federal Defender Heather Williams, through Assistant Federal Defender Hootan
Baigmoammadi, counsel for Defendant Joshua Wilson; and Kyle Knapp, counsel for Cody
Cramer that the status hearing currently set for August 20, 2024, at 9:00 be continued to
September 17, 2024, at 9:00 a.m.

29 The parties specifically stipulate as follows:

30 1. By previous order, this matter was set for a status on August 20, 2024, at 9:00
31 a.m.
32 2. By stipulation, Mr. Cramer now moves to continue the **status conference** to
33 **September 17, 2024, at 9:00 a.m.**

1 3. To date, the government has produced approximately 850 pages and various
2 audio/video recordings of discovery to the defendants.

3 4. Mr. Wilson and Mr. Cramer require additional time to review the discovery,
4 investigate and research possible defenses, research potential pretrial motions, and
5 explore potential resolutions to the case, and otherwise prepare for trial.

6 5. Counsel for Mr. Wilson just completed a trial that consumed a great deal of
7 preparation time and Mr. Cramer recently had neck surgery that has delayed work
8 on a resolution of this matter.

9 6. Mr. Wilson and Mr. Cramer believe that failure to grant the requested continuance
10 would deny them the reasonable time necessary for effective preparation, taking
11 into account the exercise of due diligence.

12 7. Neither the government nor Mr. Wilson object to the continuance.

13 8. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial
14 Act), the parties request that the time period between August 20, 2024 and
15 September 17, 2024, inclusive, be deemed excludable pursuant to 18 U.S.C. §
16 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance
17 granted by the Court at the defense's request, based on a finding that the ends of
18 justice served by granting the continuance outweighs the best interest of the
19 public, Mr. Wilson, and Mr. Cramer in a speedy trial.

20

21

Respectfully submitted,

22

HEATHER E. WILLIAMS
Federal Defender

23

Date: August 12, 2024

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Mr. Wilson

26

27

Date: August 12, 2024

/s/ Kyle Knapp
Kyle Knapp
Attorney for Mr. Cramer

28

1 Date: August 12, 2024

2 PHILLIP A. TALBERT
3 United States Attorney

4 /s/ James R. Conolly
5 James R. Conolly
6 Assistant United States Attorney
7 Attorneys for Plaintiff

8 **ORDER**

9 The Court, having received and considered the parties' stipulation, and good cause appearing
10 therefrom, **ADOPTS** the parties' stipulation in its entirety as its order.

11 IT IS SO ORDERED.

12
13 Dated: August 14, 2024

14 /s/ John A. Mendez

15 THE HONORABLE JOHN A. MENDEZ
16 SENIOR UNITED STATES DISTRICT JUDGE